

May 20, 2014

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
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File No. T1001485

Dear Ms. Walli:

Re: EB-2014-0154: Union Gas Limited (Union) Reduction of Certain Charges Applied to Direct Purchase Customers.

Industrial Gas Users Association (IGUA) Request for Intervention.

Further to the Board's Notice of Application herein, we write as legal counsel to IGUA to request intervention on behalf of our client.

Description of IGUA

IGUA is an association of industrial companies located in the Canadian provinces of Manitoba, Ontario and Québec, who use natural gas in their industrial operations. IGUA was first organized in 1973 and it provides a coordinated and effective public policy and regulatory voice for those industrial firms depending on natural gas as a fuel or feedstock. IGUA has become the recognized voice representing the industrial user of natural gas before regulatory boards and governments at both the provincial and national levels.

Nature and Scope of IGUA's Interest in the Proceeding and Intended Participation

IGUA's members generally obtain gas delivery service from Union under direct purchase arrangements, including under the rate classes in respect of which Union proposes a one time exemption from the penalty charges applicable for failure to meet contractual gas delivery obligations during February and/or March, 2014. Some of IGUA's members also take system gas supply service for portions of their gas supply requirements, and as such would be impacted by Union's proposal in respect of penalty revenues foregone. As such, IGUA's members will be directly affected by the outcome of this application.

IGUA thus intends to participate actively in this proceeding, first in order to understand Union's proposal and then to offer its views, on behalf of its affected members, to the Board on appropriate disposition of this application.

Intention to Seek an Award of Costs

IGUA also hereby requests that it be determined eligible for recovery of its reasonably incurred costs of its intervention herein.

As a party primarily representing the direct interests of industrial consumers (i.e. ratepayers) in relation to regulated services, IGUA has in the past been determined to be eligible for cost awards pursuant to section 3.03(a) of the Board's *Practice Direction on Cost Awards*.

Request for Written Evidence and Contact Information

IGUA requests that copies of written evidence and all circulated correspondence related to this matter be directed to it as follows:

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Yours truly,



Ian A. Mondrow

c: C. Ripley (Union)
R. Birmingham (Union)
C. Smith (Torys)
S. Rahbar (IGUA)